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CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Jan Simmons
Date: 6/29/92

Background Facility Information

Facility Name: Safety-Kleen
EPA Identification No.: GAD000823070
Location (City, State): Hapeville, Georgia
Facility Priority Rank: High

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.
ENTIRE FACILITY - THERE ARE 6 SWMU'S ON AC37 ACRE SITE

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

( ) No corrective action activities initiated
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Investigation (RFI) completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

( ) Operating permit
( ) Post-closure permit
(X) Enforcement order

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

( ) Yes
( ) No
( ) Uncertain; still underway

CONTINUE TO QUESTION 5 <u>ONLY</u> IF THE FOLLOWING CONDITIONS ARE MET:

- *The facility ranks "High" on the National Corrective Action Prioritization System, <u>AND</u>* -NCAPS-
- *Interim Measures have not been initiated, or if initiated, have not been successful in preventing the further spread of contamination at the facility.*

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

(X) Ground water
( ) Surface water
( ) Air
(X) Soils

Docket Number 92-272

6. Are contaminant releases migrating off-site?

(X) Yes; Indicate media, concentrations, and level of certainty.

Lappb of TPCE & 2084 Chromium in Groundwater

( ) No
( ) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes
( ) No
(X) Uncertain

7b. Is there a potential for human exposure to the contaminants released from the facility over the next five to 10 years?

( ) Yes
( ) No
(X) Uncertain

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes
( ) No
(X) Uncertain

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next five to 10 years?

( ) Yes
( ) No
(X) Uncertain

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

( ) Yes
( ) No
(X) Uncertain

Stabilization is not covered by the Order.

Additional explanatory notes:

CORRECTIVE MEASURES ARE not identified; however, since these activities are covered by an Order, they can be initiated sooner than if in a permit or issuing a new Order

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions?

( ) Solid
( ) Light non-aqueous phase liquids (LNAPLs)
(X) Dense non-aqueous phase liquids (DNAPLs)
(X) Dissolved in ground water or surface water
( ) Gaseous
( ) Other _____

13. Are one or more of the following major chemical groupings of concern at the facility?

(X) Volatile organic compounds (VOCs) and/or semi-volatiles
(X) Polynuclear aromatics (PAHs)
( ) Pesticides
( ) Polychlorinated biphenyls (PCBs) and/or dioxins
( ) Other organics
(X) Inorganics and metals
( ) Explosives
( ) Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes: Indicate possible course of action.

PUMP & TREAT

( ) No: Indicate why stabilization technologies are not appropriate; then go to Question 19.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
(X) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes
(X) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

EXTENT OF CONTAMINATION HAS NOT BEEN DETERMINED

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

( ) Yes
( ) No, not feasible
( ) No, not required

Explain final decision, using additional sheets if necessary.

It is too early in the investigations to determine

Conclusion (Designate facility category below before proceeding with conclusions)

***18. Is this facility an appropriate candidate for stabilization activities?**

( ) Yes
( ) No
(✓) Cannot tell at this time, additional data needed

Explain final decision, using additional sheets if necessary.

_____
_____
_____

Facility Category for Stabilization Evaluation

_____ Category A - Known or expected releases with either known exposures occurring or high potential for exposures to occur (immediate threat).

_____ Category B - Known or expected releases with potential for exposures to occur if Stabilization is not undertaken (not thought to be an immediate threat).

✓ Category C - Known or expected releases, low potential for exposures to occur. Significant continuing releases or migration of releases is likely to cause significant increase in ultimate clean-up cost if Stabilization is not initiated.

For "Yes" answers

Identify specific SWMU's requiring stabilization and the type of releases and summary of data available supporting decision.

_____
_____
_____
_____

For "Cannot tell at this time" answers, specify in detail the type of additional data needed to complete the Stabilization Evaluation and be SWMU specific (i.e. groundwater monitoring data around SWMU #5, old surface impoundment).

Soil Analysis & groundwater analysis around all SWMU's and groundwater analysis downgradient

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Final REVISED

8/1/19

DEC 30 1991

#2

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

SAFETY-KLEEN, HAPEVILLE

EPA SITE NUMBER: GAD-000-823-070

HAPEVILLE, GA

SCORED BY: MARNITA RILEY

OF DYNAMAC

ON 11/27/91

GROUNDWATER SCORE	:	100.00
SURFACE WATER SCORE:		15.13
AIR ROUTE SCORE	:	0.00
ONSITE SCORE	:	42.86
MIGRATION SCORE	:	54.92

Docket Number 421514

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: DICHLOROBENZENE

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:		0
DRUMS	:	0

LARGE STORAGE OR DISPOSAL AREAS ARE PRESENT

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.4

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? N

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER

24-HOUR RAINFALL: 4.0

DISTANCE TO SURFACE WATER (MILES): 0.24

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TETRACHLOROETHYLENE

TOXICITY/PERSISTANCE VALUE: 12

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

LARGE STORAGE OR DISPOSAL AREAS ARE PRESENT

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATIO
N

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.4

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

EPA ID NO. : GAD-00

0-823-070

SAFETY-KLEEN, HAPEVI

LLE

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? N

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TRICHLOROETHANE

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS	:	0
DRUMS	:	0

LARGE STORAGE OR DISPOSAL AREAS ARE PRESENT

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

0-823-070

LLE

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? Y

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BARIUM

TOXICITY/PERSISTANCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.24

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

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RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

Casey-Kline Foundry
Hapeville, Georgia

EPA SITE NUMBER: GAD000823070

SCORED BY: K. Riley

OF Programs

ON 11-27-91

GROUND WATER ROUTE SCORE :

SURFACE WATER ROUTE SCORE:

AIR ROUTE SCORE :

ON-SITE SCORE :

MIGRATION SCORE :

1990

WS-1 GROUND WATER ROUTE

A. Is there an observed release? Yes (45) | No (0) | Possible (10)

B. Route Characteristics

1b. Depth to Aquifer (ft.) 0-20 (6) | 21-75 (4) | 76-150 (2) | 150+ (0)

2b. Net Precipitation (in.) ≤-10 (0) | -10 to +5 (2) | +5 to +15 (4) | ≥15 (6)

3b. Physical State Stable Solid (0) | Unstable Solid (1) | Powder, Ash (2) | Liquid, Gas Sludge (3)

C. Containment Very Good (0) | Good (1) | Fair (2) | Poor (3)

D. Waste Characteristics

1d. Chemical name or waste code number 1. dichlorobenzene 2. tetrachloroethylene

2d. Toxicity/Persistence Value 0 (0) | 3 (3) | 6 (6) | 9 (9) | 12 (12) | 15 (15) | 18 (18)

3d. Quantity known? Yes | No

Yes? Enter amount: Cu yds or tons ____
Drums ____ (÷ 4 = cu yds)
Total ____

No? Is amount likely to be small — Yes (1) / No
Is amount likely to be large? — Yes (4) / No
Are large storage or disposal areas present? — Yes (8) / No
(only one yes allowed)

E. Targets

1e. Groundwater use:

Drinking water?	Yes (5)	No
Possible drinking water?	Yes (4)	No
Agriculture or industrial?	Yes (3)	No
Quality impacted?	Yes (2)	No
Quality not impacted?	Yes (0)*	No

(only one yes allowed)

2e. Distance to intake (miles) ≤1/2 (4) | 1/2 to 1 (3) | 1 to 2 (2) | 2 to 3 (1) | ≥3 (0)

Note:
* Cannot be used if A = 45

WS-2 SURFACE WATER ROUTE

A. Releases

1a.	Is there an observed release?	Yes (45)	No (0)
2a.	Is there a permitted outfall?	Yes (5)	No (0)
3a.	Have there been permit violations?	Yes (5)	No (0)

B. Route Characteristics

1b.	Facility Location	Flood-Prone Area (3)	100-year Flood Plain (2)	Other (1)	
2b.	24-hour Rainfall (in.)	<1.0 (0)	1.0 to 2.0 (1)	2.1 to 3.0 (2)	>3.0 (3)
3b.	Distance to surface water (miles)	<1/4 (6)	1/4 to 1 (4)	1 to 2 (2)	>2 (0)
4b.	Physical State	Stable Solid (0)	Unstable Solid (1)	Powder, Ash (2)	Liquid, Gas Sludge (3)

C. Containment

	Very Good (0)	Good (1)	Fair (2)	Poor (3)

D. Waste Characteristics

1d. Chemical name or waste code number: tetrachloroethylene

2d. Toxicity/Persistence Value

0	3	6	9	12	15	18
(0)	(3)	(6)	(9)	(12)	(15)	(18)

3d. Quantity known? Yes No

Yes? Enter amount: Cu yds or tons _____
Drums _____ (+ 4 = cu yds)
Total _____

No? Is amount likely to be small — Yes (1) No
Is amount likely to be large? — Yes (4) No
Are large storage or disposal areas present? — Yes (8) No
(only one yes allowed)

SURFACE WATER ROUTE - Continued

E. Targets

1e.	Surface Water use:	Drinking water?			Yes (5)		No
		Possible drinking water?			Yes (4)		No
		Recreation?			Yes (4)		No
		Agriculture or industrial?			Yes (3)		No
		Quality impacted?			Yes (2)		No
		Quality not impacted but within 3 miles?			Yes (1)*		No
		None within 3 miles?			Yes (0)*		No
					(only one yes allowed)		
2e.	Distance to intake or contact point (miles)	<1/2 (4)	1/2 to 1 (3)	1 to 2 (2)	2 to 3 (1)	≥3 (0)	
3e.	Distance to sensitive environment (miles)	<1/2 (6)	1/2 to 1 (4)	1 to 2 (2)		≥2 (0)	

Note:
* Cannot be used if A = 45

WS-3 AIR ROUTE

A. Releases

1a. Is there an observed, unpermitted, ongoing release? Yes (45) / No (0) — no Documentation

2a. Does the facility have an air operating permit? Yes (5) / No (0) — no Documentation

3a. Have there been any permit violations or odor complaints by residents? Yes (10) / No (0)

4a. Can contaminants migrate into air? Yes (3) / No (0)

5a. Containment — Very Good (0) / Good (1) / Fair (2) / Poor (3)

Waste are stored in 10,000 gallon underground tanks & above ground closed storage drums.

B. Waste Characteristics

1b. Chemical name or waste code number — trychloroethane? mineral spirits

2b. Toxicity — 0 (0) / 1 (3) / 2 (6) / 3 (9)

3b. Quantity known? Yes / No

Yes? Enter amount: Cubic yards or tons _____ Drums _____ (÷ 4 = cu. yds.)

Total _____

No? Is amount likely to be small? Yes (1) No
Is amount likely to be large? Yes (4) No
Are large storage or disposal areas present? Yes (8) No
(only one yes allowed)

10,000 gallon underground tanks

C. Targets

1c. Population

Are residences located within four miles? Yes (25) No
Are other industries located within four miles? Yes (20) No
Are agricultural lands located within four miles? Yes (15) No
Any other situation. Yes (10) No
(only one yes allowed)

2c. Distance to sensitive environments (miles)

< 1/2 (6) / 1/2 to 1 (4) / 1 to 2 (2) / > 2 (0) — no Documentation

WS-4 ON-SITE CONTAMINATION

A. Access to site — Inaccessible (0) | Limited Access (2) | Unlimited Access (4)

B. Is there observed surface soil contamination? — Yes (25) | No (0)

C. Containment — Very Good (1) | Good (2) | Fair (3) | Poor (4)

D. Waste characteristics

Chemical Name or Waste Code Number _____

Toxicity/Persistence Value — 0 (0) | 1 (1) | 2 (2) | 3 (3)

E. Targets

1e. Distance to residential areas — < 1/4 (6) | 1/4 to 1/2 (4) | 1/2 to 1 (2) | > 1 (0)

2e. Is there on-site sensitive environment? — Yes (1) | No (0)

CALCULATE ON-SITE SCORE (S_o)

If A = 0, then $S_o = B \times D \times (1e + 2e)/21$

If A ≠ 0, then $S_o = A \times (B + C) \times D \times (1e + 2e)/21$ [a]

If B + C > 25, then B + C = 25

(a) The value 21 standardizes the on-site route score to a value between 0 and 100.

Since 1978

The Safety-Kleen Service Center of Hapeville, Georgia has been located in an industrial & residential area. Safety-Kleen leases small parts washing equipment and solvents to customers primarily engaged in automotive repair, industrial maintenance, and dry cleaning. Leased solvents include chlorinated and non-chlorinated hydrocarbon compounds, dry cleaning solvents (perchloroethylene), and paint lacquer thinners. Hapeville service center is a product distributor and temporary storage facility for hazardous wastes collected from customers.

Wastes suspected to stored at the facility are:

Methylene chloride	F002
Orthodichlorobenzene	F002
Cresylic acid	F004
Perchloroethylene	F002/F004
Waste mineral spirits	D001/D006/D008/
Paint wastes	D001/D006/D007/ D008/F003/F005

A Preliminary site investigation indicates that soil & ground water samples exist from: →

safety-Kleen ~~the~~ two storage areas. and from spills
The storage areas are
- An underground 10,000 gallon tanks for non-chlorinated solvent (mineral spirits)

= Above ground container storage that stores used chlorinated solvents, paint waste, and used perchlorethylene which are all eventually transferred off site.

Soil contamination around the tank storage areas is include the shallow soils and vertical extension to the water table

Ground water contamination around the tank area is impacted by non-chlorinated compounds and in the ~~along~~ container storage area groundwater contamination is predominately perchloroethylene.

Two spills also occured
1) One spill in the underground area included mineral spirits + diesel fuel
2) The other spill was on the loading dock of perchloroethylene.

Most of the soils in the truck loading area was excavated and removed

Groundwater

Targets

There are wells within a 3 mile radius that serve the City of East Point municipal water supply

Distance To Intake

Safety-Kleen's ~~Permit~~ allows their facility has a small intermittent creek nearby which flows ~~north~~ to west to the Flint River. Contaminated groundwater flows south.

Surface ~~to~~ Water Route

Surface water runoff from the site drains into a concrete sump ~~w/~~ 100 ft away which collects water from a number of sources, so surface water runoff will not affect the nearby creek or Flint River.